CANCELLED

State of Alaska
Department of Labor
Division of Labor Standards and Safety

DOSH Program Directive 90-1

Date: January 24, 1990

To: All LS&S/OSH COMPLIANCE Staff

From: Tom Stuart, Director Stuart

Subject: Office IMIS Plan

A. PURPOSE: This directive will set forth the responsibilities and duties of the various personnel related to the IMIS. describe in detail the flow of IMIS documents in the office, and discuss reports that will be used in Office Management.

B. SCOPE: This directive applies to all OSH COMPLIANCE and CLERICAL personnel.

C. RESPONSIBILITIES: The responsibilities and duties of the staff related to the IMIS and CASE FILES are as follows:

The Compliance Safety and Health Officers (CSHO's) will be required to submit all IMIS forms and subsequent modifications in accordance with Appendix A of this directive.

The Clerical Staff will: data enter forms prepared by the office staff including required modifications, process citations. complaints, referrals. and related correspondence, and pull case files (inspections, complaints accidents and referrals) for review and action as required.

The Supervisory Data Entry Clerk will be responsible for: overseeing the activities of the Clerical Staff, installing software updates, resolving system difficulties (both software and hardware related). maintaining IMIS reference manuals (master sets), including the Forms Manual, Operator Skills Manual, and Report Documentation Manual. distributing manual changes to the staff. sending EOD (end of day) and SOD (start of day) transmissions. making system backups (daily, weekly, monthly).

The Office Manager will be responsible for managing user accounts, monitoring disk space, running periodic reports as required by Appendix B, and reconciling the local data base with the host.

The Office Manager will run reports that will verify and track case milestones, and will use the IMIS reports to initiate subsequent case actions. The Office Manager will spot check IMIS operations by periodically running reports as required to cross check the accuracy of the local micro data base. performing random review of forms, citations, correspondence, etc., and reviewing start of day error messages.

The Office Manager will develop and run special reports or searches as directed by the Deputy Director, analyze special and standard reports and take appropriate action as directed.

Where changes are too complex for the Office Manager to comprehend or implement, the Director will request from the OSHA Regional Administrator assistance from the computer specialists in OSHA's Region X or National Office. Minor changes will be covered informally at staff meetings or by staff memorandums.

The appropriate Assistant Chief or Chief of Compliance conduct a final review of all inspection files, referrals, complaints, and fatality reports, for technical content to assure codes, penalty calculations and other technical information follow established procedures.

The Office Manager will conduct a final review of inspection files, referrals, complaints, and fatality forms for data entry purposes, to cut down on errors and save data entry processing time. The Office Manager will monitor IMIS operations in the office by reviewing reports in accordance with Appendix B, determine with the Chief, IMIS training needs for all staff, provide feedback to the clerical staff and Chief on form errors or missing forms, and periodically review the office IMIS plans to ensure they meet the basic needs of the office.

D. DOCUMENT FLOW: The detailed procedures for document flow are discussed in Appendix A for each type of form. In general, it is critical that all forms be prepared in accordance with the Forms Manual and submitted in a timely manner. To document form initiation, review, modification, and data entry, a notation of some of the data entry steps will be made on the IMIS Action Form, by the appropriate supervisor, dated, and initialed. For those items that cannot be designated on the IMIS action form, the modification forms 166, 167-C and 167-I will be completed by the appropriate supervisor. The clerical staff will follow the instructions on the IMIS Action Form, or modification forms and data enter, date and initial.

The proper completion of documents and the accuracy of the data base will be monitored by periodically generated micro reports which are discussed in Appendix B, start of day error messages, and monthly comparison of the various reports such as abatement tracking, complaint tracking, etc., against the office open case files.

Other inspection related forms and a copy of the IMIS forms, AKDOSH-1, AKDOSH-7, AKDOSH-36, and AKDOSH-90, on all inspections which are ongoing will be kept in the possession of the CSHO. Original AKDOSH-1, AKDOSH-7, AKDOSH-36S, or AKDOSH-90 forms for which an inspection has been assigned will be turned in for data entry as soon as the information is received and kept in the pending case files drawer, a copy of the form is maintained by the csho assigned. When the inspection has been completed, the case file is turned in to the appropriate Assistant Chief for review, after the review by the Assistant Chief is completed, the case files are turned in to the administrative section for logging, retrieving the original forms that have been data entered, creating color coded case files and final review by the office manager for data entry error, the case file is then processed and returned to the Chief for signature of citations and any letters that may be a part of the inspection process.

Inspection case files are color coded by folder and label, this allows all staff to readily identify the case files as to type and classification.

Prior to closing any case or inspection, the file will be thoroughly reviewed by the appropriate Assistant Chief to ensure all documentation is included in the case file and required IMIS forms have been properly completed and updated.

E. TRAINING: New clerical and field staff will be given formal training on the IMIS as soon as possible. The need for additional training will be assessed by the appropriate supervisor. Generally whenever major changes are issued to the IMIS system, formal training will be held prior to the effective date of the change.

Refresher training will be held if needed at staff meetings. The Chief will discuss with the Office Manager problems, such as forms completion errors, that need to be addressed prior to these training sessions.

F: CASE FILE ORGANIZATION

Effective January 1, 1990, the Inspection case files will be organized as follows: 1) All case files will be filed alphabetically by establishment. The inspection case files are maintained for the present and previous year in the Anchorage Office. 2) Those Files processed for Contest or sent to Attorney Generals for collection will be filed alphabetically by establishment. These case files will be located in a file cabinet separated from the regular inspection case files. The out card will be placed in the regular file drawer to identify that file and it's new location. (3) Accident Investigation Files will be filed alphabetically and maintained in a separate file drawer, an out card is also placed to identify the new location of the actual case file. The Accident investigation case files are kept in the Anchorage Office for the present year and 2 previous years. (4) Suspense files will be maintained for each CSHO containing those AKDOSH-1's, AKDOSH-7's. AKDOSH-36, and AKDOSH-90's that have been data entered and are awaiting the completed inspection case file.

Color Coding: Color coding of inspection case files is as follows:

Folders are color coded as follows:

1) Serious/Repeat/Wilful - red folder
2) Complaint - yellow folder
3) Accident - blue folder
4) Other Violation - manila folder
5) Discrimination - orange folder
6) No inspection - brown folder

Labels are color coded as follows:

1) Programmed/programmed related/referrals/unprogrammed related - pink label
2) Complaint - yellow label
3) Accident - blue label
4) Follow-up/monitoring - white label
5) Discrimination - orange label

The non-formal complaints, complaints and referrals handled by letter will be maintained in the complaint/referral case file drawer. These complaint file folders are manila folders with a yellow stipe through the middle, and yellow label. Referrals are manila folders with a green stripe through middle and green label.

Tom Stuart
Director, LS&S

APPENDIX A
DOCUMENT FLOW

To ensure that the IMIS data base is accurate and up to date, this appendix reviews the movement of each form through the office. Obviously this plan will not account for every possible contingency that might result from certain personnel being absent on a given day, and therefore will only provide general guidelines.

INSPECTION REPORT (AKDOSH - 1): This form will be completed by the Compliance Safety and Health Officer as soon as possible after opening or attempting to open an inspection . The CSHO will keep a copy of the AKDOSH-1. and if changes are necessary after receiving more information the Csho must use a MOD AKDOSH-1 to note those changes when turning the completed report in for review. The blocks that must be completed at this time are listed in FIGURE I-1 of the IMIS Forms Manual. If OSHA 200 information has not been obtained. check the "data not available" block #32 and modify the form later in accordance with the section on modification forms, and instructions above.

Once reviewed and approved by the appropriate Assistant Chief the AKDOSH-1 form will be given to the administrative section for processing. The data-entered AKDOSH-1 will be dated and initialed by the data entry clerk and placed in the appropriate suspense files.

The status of inspections not completed will be checked by weekly review of Alaska's "Case File Lapse Time" Report.

OTHER INSPECTION RELATED FORMS - OSHA 1B, 1B (IH), 2, 2B, 2F, 91A, 92, 93, 98 and 170: The Compliance Safety and Health Officer shall submit all required forms. When the inspection is completed the case file will then be given to the appropriate supervisor for review for technical content and to ensure that all required forms have been properly completed. When the review is completed the file will be submitted to the administrative section for processing.

The Chief of Compliance will review and sign all citations/correspondence documents prepared by the clerical staff. Case files with no citations issued will be immediately closed. Inspection Case files will then be filed as described in Section F - Case File Organization.

Unprogrammed Activity Forms such as AKDOSH-7 (Complaints), AKDOSH-36S (Fat/Cats) and AKDOSH-90 (Referrals): The Compliance Officers will complete these forms as follows:

AKDOSH 7 - Complete items 1 Thru 18, 27, 28, 29, 30
AKDOSH 36 - Complete items 1 Thru 31
AKDOSH 90 - Complete items 1 Thru 19

NOTE: ALL Items MUST be completed.

The appropriate Assistant Chief will evaluate the information on the forms. and complete the remaining sections indicating appropriate action. Once the supervisor evaluates and determines what action shall be taken, the completed original AKDOSH-7, AKDOSH-36, and AKDOSH-90 forms will be given to the administrative section for processing. The assigned CSHO will be given a copy in order to complete the inspection.

When establishing the inspection case file, the report is logged manually into the administrative section then established according to instructions in section F - Case File Organization .

The administrative staff will make up case file folders, data enter the forms, and prepare citation and related correspondence to complete administrative processing. Once the Chief of Compliance has reviewed and signed the necessary documents the administrative staff will process for mailing following established administrative procedures, logging the mailing date, and other required information.

Modifications that are required to update the data base for inspections, will generally be entered on the IMIS action form by a supervisor. It is not required to complete the paper form. The supervisor shall be aware of the possible options available on these modification forms, 167I, 166 and 167C and when using the IMIS Action Form or any of the modification forms. The supervisor must assure that there is documentation in the file to justify action taken. The supervisor must provide clear direction to the clerical staff on the data entry required.

When the IMIS Action Form or 167I, 166, 167C modification forms are used to direct the clerical staff. the data entry clerk will initial and date the form upon data entering the action.

OSHA-31
Weekly Program Activity Report: This form shall be completed by all CSHOs and submitted to their supervisor by Monday of the following week. The supervisor will review and initial the forms and give them to the clerical staff for mailing to OMDS by Monday afternoon.

APPENDIX B
REPORTS PLAN

To assist in managing the office, the supervisors will review the reports listed in this appendix for accuracy and take any required action. The reports will be run as stated unless otherwise directed. A copy of these reports will be sent to the Deputy Director.

UNSATISFIED ACTIVITY REPORT - This report will identify assignments for which there is no inspection record and complaints, referrals, and accident events for which an inspection has been planned but no assignment or inspection activity is stored on the micro. automatically set to run on a monthly basis. This report is used by the Chief of Compliance to determine if the Csho has initiated the uprogrammed inspection in a timely manner.

OPEN INSPECTION REPORT "TRACKER" - This report lists all inspections which are currently open and shows the dates for significant actions. such as citations issued, quarterly. This report is given to the Chief to reveiw inspection activity.

CASES WITH CITATIONS PENDING - Alaska will use its own Early Data Entry Program - REPORTS PENDING - as the State's program defines the type of inspection i.e., complaint, accident, and whether it's an NAV or No Inspection, along with giving the laspe time. The State's Program is run on a weekly basis, and given to the Chief to determine if inspection reports are being completed in a timely manner

VIOLATION ABATEMENT REPORT - This report identifies open case files with at least one abatement date which has not been met by the run date of the report. This report is run with "active contest" marked no to get a list of case files not currently in contest that have missed an abatement date. This report is set to run automatically every Friday Evening and processed every Monday morning. The case files are pulled by clerical staff and reviewed by the Office Manager, those cases that are past due abatement are given to the appropriate Assistant Chief for further action.

PENALTY DUE REPORT - Developed by Alaska. This report lists cases where a 30-day reminder letter must be sent or the case needs to be referred to the Attorney General's office for collection, or a status code needs to be updated. This report is run the 20th of each month and given to the Office Manager to determine the next step in the collection procedure.

COMPLAINT LOG - This report provides complaint information and a status update for selected date ranges. The report indicates whether the case file is opened or closed, the formality of the complaint and whether an inspection is required. This report is run weekly and used by the Chief to determine what action must be completed to close the complaint.

REFERRAL TRACKING - This report gives the status of referrals where the employer has not responded to the letter sent, and no inspection has been initiated, or an inspection is required as a first response. This report will be run on a quarterly basis, because of the limited number of referrals that require tracking, and given to the Chief for further action.

CANDIDATE FOR MANDATORY FOLLOW-UP - This report lists violations the micro can identify as meeting FOM criteria for a follow-up inspection. This report is set to run automatically on a monthly basis and used by the Chief to select candidates for follow-up.

The State CASE FILE LAPSE TIME report which provides a breakdown of lapse time from the opening conference date to the issuance of citations. The State generated lapse time report also shows lapse time from opening conference date to data entry date for NAV's, No Inspections and Early Data Entry. Which no Federal Report does. This report is run on the 20th of each month. and used by the Chief to control lapse time for all inspections.

The INSPECTION SUMMARY REPORTS which provide statistics on various program elements are on a monthly basis. This report is run on the 20th of each month. This report is used by the Deputy Director to keep track of program activities and to assure workload objectives are met.

The FATALITY/CATASTROPHE TRACKING REPORT will be run automatically on a monthly basis for supervisors in order to focus on a particular situation. This report is given to the Chief and the Deputy Director to provide information on industrial fatalities.

The State's CO SITE REPORT provides information which identifies compliance officers inspection activity and location of inspections on a monthly basis. The report also gives monthly stats at the end of each Csho's activity for the month. This report is run the 20th of each month, and given to the Chief of Compliance, Deputy Director, Director and Commissioner.

The TENTH LETTER REPORT report identifies non-formal complaints for tenth letter inspection. This report is run on a monthly basis, and given to the Chief of Compliance.